GOLDSTEIN ISAACSON, PC

Andrew J. Goldstein (AG-7150) 100 Morris Avenue, 3rd Floor Springfield, New Jersey 07081 Telephone No. (973) 258-0500 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Lakeland Bank, a New Jersey Charter State Bank, with its principal place of business at 250 Oak Ridge Road, Oak Ridge, New Jersey 07438,

Plaintiff,

TAYLOR BABY in rem.
EDWIN RYBACKI, in personam,
RITA RYBACKI, in personam, and
MARC RYBACKI, in personam

Defendants.

Civil Action No. 07-CIV-6823 (SAS)

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MOTION FOR ORDER FOR SALE OF VESSEL PURSUANT TO RULE E(9)

Plaintiff hereby moves before this Honorable Court for an Order permitting the sale of the vessel, Taylor Baby, *in rem*, on April 4, 2008 at 12:00 p.m., pursuant to Rule E (9) of the Supplemental Rules for Certain Admiralty and Maritime Claims. The plaintiff relies upon the accompanying Certification of Andrew J. Goldstein, Esq. in support of this motion. A proposed form of Order is also being submitted herewith.

GOLDSTEIN ISAACSON, PC Attorneys for Plaintiff

By:

ANDREW J. GOLDSTEIN

Dated: 2/29/08